



U.S. Department of Justice

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District of Puerto Rico

EXHIBIT IV

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April 8 2004

Miguel E. Miranda, Esquire
PMB 132
500 Muñoz Rivera - Local 151
San Juan, Puerto Rico 00918-3349

Re: ANGEL MORALES VALLELLANES vs. U.S. POSTAL
SERVICE, et al. - Civil No. 97-2459 (JAG)

Dear Atty. Miranda:

This letter is to be interpreted within the meaning of Local Rule 26(b) relative to discovery disputes.

Reference is made to your recent Notices for the Taking of Depositions of fourteen (14) persons in the above-captioned case.

At the outset and as we discussed over the telephone, we are dropping Carmen Rosa from defendant's witness list. In addition, the following persons are not listed as defendant's witnesses for this case and, therefore, are not deemed to be represented by the undersigned for deposition purposes. They are the following:

- 1) Inspector Ron Barraga
- 2) Eleizer Báez
- 3) Candido López
- 4) John Malave
- 5) Pedro Reyes and
- 6) William Morales

As to the remaining potential deponents, it is my belief that Virginia Matias and Jose Sepulveda are retired, but we will make every effort to make them available for depositions.

We suggest that depositions be limited to persons who have personal knowledge of the critical or crucial facts that allegedly sustain your client's allegations, because, this will yield a more protective discovery process.

Cordially,

H. S. GARCIA
United States Attorney

Fidel A. Sevillano Del Rio
Assistant U.S. Attorney

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